



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE CITIGROUP AUCTION RATE  
SECURITIES LITIGATION

1:08-CV-03095-LTS

AND RELATED CASES

THIS DOCUMENT RELATES TO:

09-MD-2043-LTS

*Ocwen Financial Corp.*, 09-CV-8501-LTS

STIPULATION AND ~~PROPOSED~~ ORDER

WHEREAS Defendant's last day to move, answer or otherwise respond to the Complaint is currently December 7, 2009.

WHEREAS the Court previously granted the parties' proposal to extend Defendant's time to move, answer, or otherwise respond to the Complaint from November 5, 2009 to December 7, 2009.

WHEREAS the parties herein are attempting to reach a resolution to their dispute outside of court.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for each of the parties, that the Defendant's last day to move, answer or otherwise respond to the Complaint shall be extended for 30 days. Accordingly, the Defendant's response shall be due on or before January 4, 2010.

Dated: December 4, 2009  
New York, New York

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

By: 

Brad S. Karp  
Susanna M. Buerger  
Karen R. King  
1285 Avenue of the Americas  
New York, New York 10019-6064  
Tel. (212) 373-3000  
Fax (212) 757-3990  
bkarp@paulweiss.com  
sbuerger@paulweiss.com

Charles E. Davidow  
2001 K Street, N.W.  
Washington, D.C. 20006-1047  
Tel. (202) 223-7300  
Fax (202) 223-7420  
cdavidow@paulweiss.com

*Counsel for Defendant Citigroup Global  
Markets Inc.*

MILLER & WRUBEL P.C.

By: 

Joel E. Miller  
Adam J. Safer  
570 Lexington Avenue  
New York, New York 10022  
Tel. (212) 336-3500  
Fax (212) 336-3555  
jmill@mw-law.com  
asafer@mw-law.com

*Counsel for Plaintiffs Bankruptcy  
Management Solutions, Inc., and BMS  
Holdings, Inc.*

SO ORDERED: 

U.S.D.J.